

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

ROBERT FRESE,)	
)	
)	
Plaintiff)	
)	
v.)	Case No. 118-cv-01180-JL
)	
GORDON J. MacDONALD, in his)	
official capacity as Attorney General)	
of the State of New Hampshire only,)	
)	
Defendant)	
)	

ASSENTED-TO MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE PLEAD UNTIL MARCH 13, 2020

Now comes GORDON J. MacDONALD, in his official capacity as Attorney General of the State of New Hampshire only, by and through counsel, the New Hampshire Attorney General's Office, and states as follows:

1. As the Defendant's Motion to Dismiss (Doc. # 11) was resolved by this Court's Orders dated October 25, 2019 (Doc. # 18) and February 14, 2020 (Doc. # 25), the Defendant is obliged to answer or otherwise plead on or before February 28, 2020. *See* Fed. R. Civ. P. 12(a)(4)(A).

2. In light of certain extraordinary February to March workload requirements of counsel, as well as a previously scheduled vacation requiring already booked air travel out of state, Defendant seeks an extension of time to serve his answer until March 13, 2020.

3. No party would be unduly prejudiced by the requested extension.
4. Counsel for the Plaintiff concurs in the relief requested.

5. In light of the subject matter of this motion, no memorandum of law is deemed necessary. *See L.R. 7.1(a)(2).*

WHEREFORE, Defendant respectfully requests that this Honorable Court:

- A. Extend the time period within which the Defendant may answer or otherwise plead until March 13, 2020; and
- B. Grant such other and further relief as justice may require.

Respectfully submitted,

GORDON J. MACDONALD, in his official capacity only as Attorney General of the State of New Hampshire

By his attorney,

GORDON J. MacDONALD
ATTORNEY GENERAL

Date: February 26, 2020

By: /s/ Rebecca D. Ricard
Rebecca D. Ricard, Bar #265503
Attorney
Lawrence M. Edelman, Bar # 738
Assistant Attorney General
Civil Bureau
New Hampshire Dept. of Justice
33 Capitol Street
Concord, NH 03301
(603) 271-3650
lawrence.edelman@doj.nh.gov
rebecca.ricard@doj.nh.gov

Certificate of Service

I hereby certify that a copy of the foregoing Assented-To Motion to Extend Time to Answer or Otherwise Plead Until March 13, 2019 was served this 26th day of February, 2020, on all counsel of record, via the ECF System.

/s/ Rebecca D. Ricard
Rebecca D. Ricard